## UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA :

: No. 3:18-CR-0097

v. :

(Judge Mariani)

ROSS ROGGIO, and

ROGGIO CONSULTING Co, LLC :

Defendants. : (electronically filed)

## **BILL OF PARTICULARS**

The United States of America, by its undersigned counsel and, pursuant to Federal Rule of Criminal Procedure 7(f), voluntarily files this Bill of Particulars in response to defendant's Motion for a Bill of Particulars and Brief in Support. Docs. 166-167.

- 1. The Kurdish military compound referenced in paragraphs 5, 10, 12, 13, 14, 15, 16, 17, and 19 of the Superseding Indictment was located on the outskirts of Sulaymaniyah, in the Kurdistan region of Iraq.
- 2. Defendant conspired with Kurdish soldiers acting under color of law to torture the victim, as charged in Count One of the Superseding Indictment, and acted jointly with and aided and abetted Kurdish soldiers acting under color of law to torture the victim, as alleged in Count Two of the Superseding Indictment.

Dated: October 24, 2022 Respectfully submitted,

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## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that he is an employee in the Office of the United States Attorney for the Middle District of Pennsylvania and is a person of such age and discretion to be competent to serve papers.

That on October 24, 2022, he served a copy of the attached **GOVERNMENT'S BILL OF PARTICULARS** 

by electronic means to:

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Jason A. Shrive jshrive@shrivelaw.com

<u>/s/ Todd K. Hinkley</u>
Todd K. Hinkley
Assistant United States Attorney